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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

- (1) MIKE ALFONS CAMPA, *aka***
Mike Heretel,
(2) STEVEN WILLIAM
CARPENTER,
(3) SUZETTE GULYAS GAL,

CR 12- 65 -GF- SEH

INDICTMENT

CONSPIRACY TO COMMIT
FRAUD (Count I)
Title 18 U.S.C. § 371
(Penalty: Five years
imprisonment, \$250,000 fine,
and three years supervised
release)

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| (4) ANDRAS ZOLTAN GAL, (5) KRISZTIAN ZOLTAN GEORGE GAL, and (6) DANA YVONNE KENT, Defendants. | INVESTMENT FRAUD/WIRE (Count II) Title 18 U.S.C. § 1343 (Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release) INVESTMENT FRAUD/MAIL (Count III) Title 18 U.S.C. § 1341 (Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release) |
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THE GRAND JURY CHARGES:

INTRODUCTION

1. The Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation is a federally recognized Indian tribal organization whose governing authority has been vested in the Tribal Executive Board in Poplar, Montana.

2. The U.S. Department of the Interior, Bureau of Indian Affairs (BIA), with trust responsibilities to tribal members and oversight over lands held by tribal members, reviews and approves applications for leases of oil and gas development on the Fort Peck

Indian Reservation.

3. Between on or about June 13, 2006, and continuing thereafter until on or about October 5, 2007, Domestic Energy Solutions applied for and received approval for three oil and gas leases on the Fort Peck Indian Reservation at the end of which period the leases were all terminated for failure to make required lease payments.

4. At all times relevant hereto, the defendant, MIKE ALFONS CAMPA, also known as *Mike Heretel*, solicited investments on behalf of Domestic Energy Solutions and a successor entity, U.S. Oil and Gas, LLC.

5. At all times relevant hereto, the defendant, STEVEN WILLIAM CARPENTER, solicited investments on behalf of Domestic Energy Solutions and a successor entity, U.S. Oil and Gas, LLC.

6. At all times relevant hereto, the defendant, SUZETTE GULYAS GAL, served as a representative with signature authority for Domestic Energy Solutions in obtaining lease documents from the Bureau of Indian Affairs; then used the documents to solicit investment from persons contacted by MIKE ALFONS CAMPA, *aka Mike Heretel*,

and STEVEN WILLIAM CARPENTER.

7. At all times relevant hereto, the defendant, ANDRAS ZOLTAN GAL, opened and used bank accounts in the names of Domestic Energy Solutions and U.S. Oil and Gas, LLC, which he opened listing himself as the sole proprietor of those business ventures.

8. At all times relevant hereto, the defendants, KRISZTIAN ZOLTAN GEORGE GAL and DANA YVONNE KENT, assisted the other conspirators in the promotion of the scheme, and the transaction of monies obtained therefrom.

COUNT I

That between on or about June 13, 2006, and continuing thereafter until on or about August 24, 2012, at Poplar, in the State and District of Montana, and other places, the defendants, MIKE ALFONS CAMPA, *aka Mike Heretel*, STEVEN WILLIAM CARPENTER, SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, did knowingly combine, conspire and agree together, and with diverse other persons to the Grand Jury both known and unknown, to violate the laws of the United States, that is, having devised and intending to

devise a material scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, and attempting to do so, did *a*) knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of 18 U.S.C. § 1343, and *b*) knowingly placed in any post office or authorized depository for mail matter, send or cause to be sent or delivered by the Postal Service, or deposited or caused to be deposited any matter to be sent or delivered by any private or commercial interstate carrier, or took or received therefrom, any such matter or thing, or knowingly caused to be delivered by mail or such carrier, in violation of 18 U.S.C. § 1341.

OBJECT OF THE CONSPIRACY

It was the object of the conspiracy, its means and methods, to obtain funds from persons persuaded to invest in a fraudulent and fictitious oil and gas investment opportunity on the Fort Peck Indian

Reservation.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the conspirators committed the following overt acts.

1. On or about June 13, 2006, MIKE ALFONS CAMPA, doing business as Domestic Energy Solutions, made a commitment to lease certain property on the Fort Peck Indian Reservation for oil and gas development.

2. On or about June 13, 2006, SUZETTE GULYAS GAL, as President of Domestic Energy Solutions, faxed an Offer to Lease to the Superintendent of the Fort Peck Agency, Bureau of Indian Affairs, relating to Allotment Numbers 3482, M3482-A, and M3482-B, to drill for and then produce oil and natural gas.

3. On or about October 27, 2007, SUZETTE GULYAS GAL signed for a letter, dated October 17, 2007, from the Superintendent of the Fort Peck Agency, Bureau of Indian Affairs, to Domestic Energy Solutions, 5818 Via Romero, Yorba Linda, CA 92887, informing Domestic Energy Solutions that their three oil and gas leases on the Ft Peck Indian Reservation were cancelled effective October 5, 2007.

4. On or about October 2, 2009, ANDRAS ZOLTAN GAL opened a business account at US Bank for Domestic Energy Solutions as a sole proprietorship owned by him, with a \$2,500 check dated October 1, 2009, made payable to Domestic Energy Solutions with the notation of "1% of gross oil rig & leases Mike Campa."

5. On or about December 15, 2009, MIKE ALFONS CAMPA, using the alias name *Mike Heretel*, opened an e-mail account addressed as domesticenergy@att.net which would be used to communicate with, and solicit investments from, potential investors in Domestic Energy Solutions.

6. On or about December 15, 2009, MIKE ALFONS CAMPA sent an e-mail message with the 2006 Fort Peck documents attached, and with a subject line of "bakken oil formation," which read, in part, "attached are our 3 leases and rig info. Your \$5,000 investment will include a ½% ownership in all 3 leases and the oil rig. You will recoup your initial investment within the first 90 days and monthly revenue thereafter. Please contact me at 281 936 8595 or 714 928 5391 asap. Thank you. Mike."

7. On or about March 15, 2010, MIKE ALFONS CAMPA, using

the domesticenergy@att.net account, sent a message with a subject line of "bakken oil with rig info" which read, in part, that "[y]our \$25,000.00 investment will entitle you to a 1% ownership in Domestic Energy Solutions and all income generated, which includes but is not limited to the following leases on the Ft. Peck Indian Reservation, 14-20-0256-0388, 0389 & 0390. Your 1% will also include income generated by our currently operating drilling rig and future income from a refinery, pipelines and other land leases. You will recoup your initial investment with 6 months of receipt and begin receiving monthly checks thereafter. Upon receipt of your funds, payable to Domestic Energy Solutions, we will file your name with the Bureau of Land Management in Montana, and they will in turn forward you the necessary paperwork and contacts."

8. On or about June 30, 2011, MIKE ALFONS CAMPA sent an e-mail message from the domesticenergy@att.net account, to a potential investor, copied to STEVEN WILLIAM CARPENTER at stevecarpenter26@gmail.com, which read, in part, "Domestic Energy Solutions and US Energy will be one LLC and you will get ownership as a non liable partner... Your patience will be well rewarded. Thanks,

Mike P.S. I'll try to avoid you having to wire the \$5000 tomorrow and let you overnight a check."

9. On or about September 12, 2011, ANDRAS ZOLTAN GAL opened a business account at US Bank for U.S. Oil and Gas, LLC, as a sole proprietorship involved in the oil drilling business with a check payable to U.S. Oil and Gas with a notation indicated "1% ownership."

10. On or about October 27, 2011, STEVEN WILLIAM CARPENTER, using the usoil@att.net account, sent an e-mail message to a potential investor with a subject line of "montana oil" which read, in pertinent part, "[e]ach \$30,000.00 investment will entitle you to a 1% ownership in US Oil and Gas and all income generated on the Ft. Peck Indian Reservation. Each percentage will also include income generated by all oil and natural gas, our drilling rigs, a 20,000 bpd refinery, pipelines and other land leases. You will recoup your initial investment within 120 days of completion and monthly checks thereafter of at least 5 percent. Upon receipt of your funds, payable to U.S. Oil and Gas, we will file your name with the Bureau of Land Management in Montana, and they will in turn forward you the necessary paperwork and contacts. Attached is our official letter of

intent and other documents. Check out this confidential report ...
Thankyou (sic) for your Trust and Confidence. We look forward to
sharing our success with you. Steve Carpenter.”

11. On or about May 1, 2012, STEVEN WILLIAM CARPENTER advised a potential investor that he, the investor, would receive paperwork from the Bureau of Land Management and the Bureau of Indian Affairs that would show that the investor had an ownership interest in the Indian mineral rights and that he, CARPENTER, was required to have, and had posted, an irrevocable \$75,000.00 certificate of deposit bond with the Bureau of Indian Affairs in connection with the project.

12. Between October of 2009 and May 25, 2012, MIKE ALFONS CAMPA, *aka Mike Heretel*, and STEVEN WILLIAM CARPENTER, aided and assisted by SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, solicited and received approximately \$675,406.62 in monies and funds from investors predicated on the promise of return from an oil and gas development project on the Fort Peck Indian Reservation.

All in violation of 18 U.S.C. § 371.

COUNT II

That between on or about June 13, 2006, and continuing thereafter until on or about August 24, 2012, at Poplar, in the State and District of Montana, and other places, the defendants, MIKE ALFONS CAMPA, *aka Mike Heretel*, STEVEN WILLIAM CARPENTER, SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, having devised and intending to devise a material scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

THE FRAUDULENT INVESTMENT SCHEME

During the period of the Indictment, it was part of the scheme and artifice to defraud investors, that the defendants, MIKE ALFONS

CAMPA, *aka Mike Heretel*, and STEVEN WILLIAM CARPENTER, aided and assisted by SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, would solicit and receive monies and funds based on the fraudulent representation that the payments represented an investment in an oil and gas development project on the Fort Peck Indian Reservation in northeast Montana.

THE INTERSTATE WIRE COMMUNICATIONS

Between on or about June 13, 2006, and continuing thereafter until on or about August 24, 2012, MIKE ALFONS CAMPA, *aka Mike Heretel*, and STEVEN WILLIAM CARPENTER, aided and assisted by SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, having devised and intending to devise a material scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, as described herein, and for the purpose of executing the scheme to defraud, did transmit and cause to be transmitted by means of wire, radio, and television

communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, that is, the defendants made and caused to be made telephone calls to the Bureau of Indian Affairs in Poplar, in the State of Montana, from Yorba Linda, and other places, in the State of California, and thereafter wire transfers of funds from the States of Hawaii, Mississippi, Nebraska, New York, Arizona, and others, to Yorba Linda, in the State of California, in violation of 18 U.S.C. § 1343.

COUNT III

THE FRAUDULENT INVESTMENT SCHEME

During the period of the Indictment, it was part of the scheme and artifice to defraud investors, that the defendants, MIKE ALFONS CAMPA, *aka Mike Heretel*, and STEVEN WILLIAM CARPENTER, aided and assisted by SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, would solicit and receive monies and funds based on the fraudulent representation that the payments represented an investment in an oil and gas development project on the Fort Peck Indian Reservation in northeast Montana.

From on or about June 13, 2006, through on or about August 24, 2012, at Poplar, in the State and District of Montana, and elsewhere, the defendants, MIKE ALFONS CAMPA, *aka Mike Heretel*, STEVEN WILLIAM CARPENTER, SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA YVONNE KENT, with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

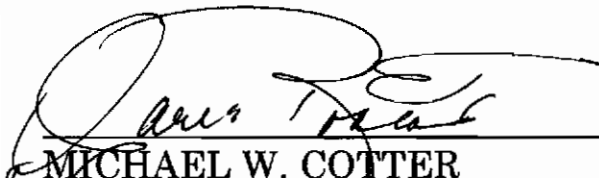
USE OF THE MAIL OR INTERSTATE CARRIER


From on or about June 13, 2006, through on or about August 24, 2012, at Poplar, in the State and District of Montana, and elsewhere, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendants, MIKE ALFONS CAMPA, *aka Mike Heretel*, STEVEN WILLIAM CARPENTER, SUZETTE GULYAS GAL, ANDRAS ZOLTAN GAL, KRISZTIAN ZOLTAN GEORGE GAL, and DANA

YVONNE KENT, knowingly caused to be delivered by mail and by private and commercial interstate carrier according to the direction thereon, checks and other monetary instruments representing investment in the scheme, in violation of 18 U.S.C. § 1341.

A TRUE BILL.


FOREPERSON


MICHAEL W. COTTER
United States Attorney
Attorney for Plaintiff


KRIS A. McLEAN
Criminal Chief Assistant U.S. Attorney
Attorney for Plaintiff

Kristian *hal*
Suzette *hal*
Andreas *hal*
Crim. Summons *✓✓✓*
Warrant: _____
Bail: _____

Campa, Carpenter, Kent in USMS
custody